

Message

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Sent: 1/16/2021 12:29:58 AM
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CC: Caroline Hammett [CarolineHammett@iepcoco.com]
Subject: TSCA/iPCB 2021 Project Evaluation
Attachments: ATT00001.txt; 2020 iPCB Project Rating Chart_Rev. 2.xlsx

Hello TSCA/iPCB Workgroup Participants – per our meeting on January 6th, attached is the evaluation of the TSCA/iPCB/Green Chemistry Projects proposed for 2021. This evaluation includes corrections from a couple members that had mistakenly reversed their voting criteria, and also includes an evaluation of “null” values for those of you who did not believe that certain projects were consistent with the work of the SRRTTF or could not be supported by your various organizations. Interestingly, the top 5 projects were the same regardless of how they were evaluated. Based on our discussions, I also took the liberty to remove those projects that did not meet the goals of the SRRTTF and ones that may be better addressed by others outside of the SRRTTF. The following is a summary of the results:

Projects Meeting the Definition and Goals of the SRRTTF:

| Project Number | Proposed iPCB/TSCA Workgroup Project Description |
|----------------|--|
| 2 | Develop Industry List of Pigments (Chlorinated vs. Non-Chlorinated) |
| 1 | Newsprint/Graphic Printing Trials w/Non-Chlorinated Inks/Pigments |
| 6 | Further Develop iPCB Education & Outreach Campaign Objectives |
| 5 | Lower Procurement Limits Campaign, Phase 1 - 3rd Party research effort |
| 4 | Sources & Pathways of PCB-11, Phase 1 - 3rd Party research effort |
| 7 | Petition EPA to enforce PCBs in products under TSCA |
| 8 | Petition EPA to perform Cost/Benefit Analysis and reevaluate TSCA |

Projects Not Meeting the Definition and Goals of the SRRTTF:

| Project Number | Proposed iPCB/TSCA Workgroup Project Description |
|----------------|--|
| 3 | Develop Certification Program for Products and/or Pigments |
| 4 | Evaluate fate of PCB-11, Phase 1 - 3rd Party research effort |
| 9 | Petition EPA to consider Alternative WQS for iPCBs |

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|----|---|
| 10 | Petition EPA to consider NPDES permit offsets for iPCBs |
| 11 | Petition EPA to update the 1996 Cancer Dose-Response Assessment |

We can talk more about this at our next meeting, but I am proposing the following to help consolidate our approach and provide further definition to the project scopes:

1. Project #2 (Develop Industry List of Chlorinated vs. Non-Chlorinated Pigments) needs to be completed to support Project #1 (Newsprint/Graphic Printing Trials w/Non-Chlorinated Inks/Pigments). I suggest that a 3rd party (i.e.: Gonzaga) be contracted to help develop this listing with the assistance of trade organizations.
2. Project #6 (Further Develop iPCB Education & Outreach Campaign Objectives) should fall to the responsibility of the Education & Outreach workgroup, so I suggest removing this from consideration of the TSCA/iPCB workgroup. We will continue to support the E & O as needed.
3. Project #5 (Lower Procurement Limits Campaign, Phase 1 - 3rd Party research effort) stands on its own and I suggest that we develop a scope for a 3rd party contract to implement.
4. Project #4 (Evaluate fate of PCB-11, Phase 1 - 3rd Party research effort) stands on its own and I suggest that we develop a scope for a 3rd party contract to implement. We shall also redefine the scope of this work as "Sources & Pathways of PCB-11" to better fit the goals of identifying and reducing sources of PCBs to the Spokane River since it is the most prevalent congener in the watershed. Note that I moved "Evaluate fate of PCB-11" to projects best suited for others since this definition was controversial for meeting the criteria of the SRRTEF.
5. I focused on the top 5 for simplicity, so we can talk about project numbers 7 and 8 (petitioning EPA on enforcement and cost/benefit of TSCA) based on benefit and resource availability.

Doug

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Environmental Manager



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